



**National Council of
Women of New Zealand**

Te Kaunihera
Wahine O Aotearoa

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**Submission to Food Safety Australia New Zealand on the Draft Assessment Report for the
Consideration of Mandatory Fortification with Iodine (P230)**

The National Council of Women of New Zealand (NCWNZ) is an umbrella organisation representing 33 Nationally Organised Societies and 12 National Members. It also has 30 branches throughout the country attended by representatives of those societies as well as some 150 other organisations and individual members.

The Council's function is to work for the wellbeing of women, the family and the community at local, national and international levels through research, study, discussion and action.

Primarily NCWNZ's interest has been, and is, with the protection and management of Public Health and Safety from the consumer perspective. NCWNZ continues to maintain its long held interest in food quality, food standards and health issues relating to food, and welcomes the opportunity to make this submission on the Mandatory Fortification of the Food Supply with Iodine on behalf of the membership.

Due to time constraints we were unable to consult widely with our members on this paper, which highlights the proposed changes in response to additional information obtained and outlines key issues for consideration.

The information was circulated to the nucleus group and corresponding members of the Consumer affairs Standing Committee.

General Comments

NCWNZ prepared and sent a submission to FSANZ following a release of the Draft Assessment in August 2006. At that time the members of the branches and affiliated organisations were circulated with questions relating to Mandatory Fortification of the Food Supply with Iodine. This generated considerable interest and discussion and resulted in a large response on the subject. Responses reflected a positive attitude to the proposal to mandatory fortification of bread and cereal products with iodine. However a concern was expressed then about using biscuits as a food vehicle.

The revised approach and changes in response to the additional information obtained was accepted by the members who responded, and considered this was an improvement to the original proposal.

The mandatory replacement of salt with iodised salt in bread with a salt iodisation range of 35-55 of iodine per kilogram of salt was fully supported as was retaining the voluntary permission for iodine in iodised salt and adjusting it to 25-55 mg per kilogram.

A few members questioned the increased amount of iodine in iodised salt and expressed concerns that consumers who used iodised salt as a regular additive to their food and who would also receive iodised salt in bread would possibly be at risk of overdosing.





Responses endorsed that for those with existing thyroid disorders, iodine deficiency disorders receiving treatment or with an intolerance of iodine, it would be necessary to ensure these people have regular visits and check ups and ongoing monitoring with their health professionals.

It was reassuring for those members who had concerns regarding consumer health risks that studies have shown that the addition of iodine had a high degree of safety.

The majority of members' responses again agreed that the fortification of bread with iodised salt should be mandatory and not a voluntary permission and were supportive of organic breads being exempt and so offering consumers a choice.

The fortification of bread with iodised salt was the preferred choice to the addition of the iodine to milk/milk products and most responses expressed concern should salt be universally iodised or iodised salt added to any processed foods.

It was agreed that the expected impact of the proposal to replace salt with iodised salt in bread will contribute to alleviating the consequences of existing iodine deficiency.

The strategy outlines and takes into account safety and cost benefit effectiveness which were areas of concern for many members and seen as a priority consideration for those who responded.

Specific Comments

Concerns expressed in the previous submissions regarding fortification of the food supply were again reiterated as important considerations:

- Labelling must be altered to reflect any changes and be compulsory and easily read by the consumer.
- "Monitoring systems to ensure the ongoing effectiveness and safety of the mandatory fortification programme and formal reviews" are considered essential.
- Adherence to the risk management strategy to ensure iodine consumption is increased to the desired levels discussed in the proposal.
- "Education initiatives to raise awareness and understanding of the proposed standard" and "collaboration with other organisations that play a role in providing education to consumers" are seen as an essential component of any proposed changes.
- Ensure that target groups in the population, for example, those with existing thyroid disorders should receive advice to avoid iodine rich foods or additional use of iodised salt.
- Ensure that pregnant and breast feeding women are advised they will need additional iodine supplements as their requirements are higher and sufficient iodine will not be received through fortification. Specific messages giving information and education need to be developed as outlined for this particular priority group.

The extensive reviews of available scientific and medical literature and reconvening of the iodine Specific Advisory Group showing a high degree of safety is reassuring to the members who responded expressing concerns and they commended the approach taken to ensure safety for the consumer while addressing a major health concern.



The consideration to provide changes by the mandatory fortification of bread with iodised salt to a specified measurement is seen by the majority of our members as the most effective public health strategy to address the re-emergence of iodine deficiency in the population over the last decade.

NCWNZ thanks the Food Standards Australia New Zealand (FSANZ) for the opportunity to further comment on this very important issue relating to the health of all New Zealanders and in particular the serious consequences of deficiency for pregnant and lactating women, babies and young children.

NCWNZ looks forward to being informed of the outcome following completion of the final assessment report.

Christine Low
National President

Jan Brown
Convener, Consumer Affairs Standing Committee